

October 15, 2002

## Greetings all:

As one of the few organic dairymen on the OTA livestock committee, I support the proposed statement of clarification language regarding treatment of young dairy stock.

Straus Family Creamery and our dairy, Blake's Landing Farms, have been certified organic since February 1994. We were the first certified organic dairy and creamery in western United States.

With a lifetime of dairying experience, I can say raising dairy calves is not easy<sup>1.</sup> We and other organic dairymen have had years when we lost a significant part of our calf crop. Over time we have developed a program that incorporates all-organic feed and living conditions from birth. We have been able to minimize our use of antibiotics with a comprehensive calf health program including proper vaccination, nutrition, and living conditions. Even with this program in place, there are still times when we need to use antibiotics.

It is my feeling that a calf treated in the first six months of life with a therapeutic treatment of antibiotics should be allowed to keep its organic status and be eligible to produce organic milk a year and a half later. I do not think it is the intent of the organic regulations to condemn calves that get sick to a life of confinement, daily medications and stress in a conventional feedlot.

Allowing treatments for young livestock does not preclude a reliance on inputs instead of good management. It allows a young animal the chance to overcome adversity and rejoin the herd after the specified withholding period. The record keeping of medical treatments is already standard operating procedure for organic dairy operations. The proposed statement of clarification would support good management practices and encourage organic dairy farmers to raise their own replacement stock.

Sincerely,

Albert Straus Straus Family Creamery